

Nick Morisani (3351)

From: Lisa Simpson <elizabeth.simpson@comcast.net>
Sent: Wednesday, January 19, 2022 3:43 PM
To: Nick Morisani (3351); Reuben Anderson (3339); rchambers@cglawpartners.com; tgaylor@co.hinds.ms.us; Tommy Siler (3357)
Cc: 'Cheng, Christopher (CRT)'; 'Cowell, Laura (CRT)'; 'Vera, Helen (CRT)'; 'Steege, Sarah (CRT)'
Subject: RE: site visit
Attachments: January 2022 site visit schedule.docx

I am attaching the schedule. I will be on site Monday and Tuesday and then remote Thursday and Friday. Dave plans on being on site the whole week and Rick is doing his visit remotely. Jim is ill and is postponing his visit. I will update you with his plans when they firm up.

From: Nick Morisani (3351) <Nicholas.Morisani@phelps.com>
Sent: Wednesday, January 19, 2022 2:32 PM
To: Lisa Simpson <elizabeth.simpson@comcast.net>; Reuben Anderson (3339) <Reuben.Anderson@phelps.com>; rchambers@cglawpartners.com; tgaylor@co.hinds.ms.us; Nick Morisani (3351) <Nicholas.Morisani@phelps.com>; Tommy Siler (3357) <Tommy.Siler@phelps.com>
Cc: Cheng, Christopher (CRT) <Christopher.Cheng@usdoj.gov>; Cowall, Laura (CRT) <Laura.Cowell@usdoj.gov>; 'Vera, Helen (CRT)' <Helen.Vera@usdoj.gov>; 'Steege, Sarah (CRT)' <Sarah.Steege@usdoj.gov>
Subject: Re: site visit

Lisa,

Thank you for the email. We do not view the motion as preventing the planned site visit next week, but I ask that you please let us know what day(s) you plan to conduct the site visit next week.

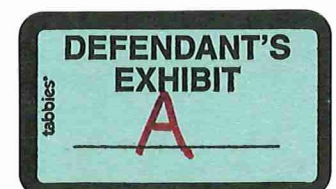
Thanks.

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From: Lisa Simpson <elizabeth.simpson@comcast.net>
Sent: Wednesday, January 19, 2022 3:12 PM
To: reuben.anderson@phelps.com; rchambers@cglawpartners.com; tgaylor@co.hinds.ms.us; nicholas.morisani@phelps.com; silert@phelps.com
Cc: Cheng, Christopher (CRT); Cowall, Laura (CRT); 'Vera, Helen (CRT)'; 'Steege, Sarah (CRT)'
Subject: site visit

Hello Counsel, I understand that defendants will be filing a motion under the PLRA this week. You have mentioned that the filing of the motion triggers a stay. I am not very familiar with the stay provisions of the PLRA. Can you tell me if it is your position that the stay prevents my team from doing the planned site visit next week? Would you plan on opposing compensation/reimbursement for the site visit based on the stay. I would appreciate a response as soon as possible so that we can do what we need to do to change plans if necessary.

Thank you,
Lisa Simpson



Date and Time (CT)	Lisa	Dave	Jim (rescheduled due to illness)	Rick
Monday January 24 th 9:00	Major Bryan, Captains Simon, Caston and Conner	Major Bryan, Captains Simon, Caston and Conner		HAS Weinfield
10:30	Tour RDC	Tour RDC		11:00 Representative from Nursing Staff
1:30	Sgt Tillman PREA-Sheena Fields	Tour WC		Major Bryan
2:30				MH Coordinator
3:30				Ms. Martin
Tuesday, 25 th 9:00	Mazie Jones and Lt. George	Sgt WC		Medical Nurse Practitioner Lott
10:00	10:30 Priscilla Dawson			Mental Health Nurse Practitioner Bell
12:00	Lt. Childs (and IAD investigator)	Lt. Childs (and IAD investigator)		Discharge Nurse Buffington
1:00		Lt. Holmes, Investigators Elkins and Edwards		1:30 Mental Health Unit with Ms. Martin, Krista Chick, and others designated by QCHC
2:00	Tony Gaylor and County Administrator Jones	Tony Gaylor and County Administrator Jones		
3:00				
4:00	Sheriff Jones	Sheriff Jones		
Wednesday, 26 th				
9:00	travel	Doris Coleman		Person with full access to EMR for medical records review
10:30		Mioka Laster		
1:00		Sgt. Winter		HAS Winfield
3:00		Tony Hannah		
Thursday, 27 th				

9:00	Jamekia Scott (remote)	Captain Burley and Lt. Knox		
11:00	Tanecka Moore (remote)			
1:00	Pretrial Services Director (remote)	Sgt. Booking		
2:30		Sgt. RDC housing		
4:00				
Friday, 28th				
9:00	Master Planning	Master Planning		